

**From:** Ana Prados [ana\_prados@yahoo.com]

**Sent:** Monday, November 19, 2007 4:51 PM

**To:** Darton, Terry

**Cc:** Ana Prados

**Subject:** sierra club comments on Mirant SOP

Terry, attached are Sierra club (VA and DC chapter) comments on the Mirant SOP.

Thanks

Ana



November 19<sup>th</sup>, 2007

David K. Paylor, Director  
Virginia Department of Environmental Quality  
629 East Main Street,  
Richmond, VA 23219

Members of the Virginia State Air Pollution Control Board  
Virginia Department of Environmental Quality  
629 East Main Street,  
Richmond, VA 23219

**Re: Proposed Stationary Source Permit to Operate Dated October 19<sup>th</sup>, 2007  
Mirant Potomac River Generating Station, Alexandria, Virginia**

Dear Director Paylor and Members of the Virginia State Air Pollution Control Board:

Thank you for the opportunity to comment on the proposed draft State Operating Permit (SOP) for the Potomac River Generating Station (PRGS) in Alexandria. We present these comments on behalf of our +16,000 members in Virginia and +3000 members in the District of Columbia

The Sierra Club urges the board to oppose this draft permit in its present form. Our major concern is that this draft permit allows an increase in emissions of PM<sub>2.5</sub> and other pollutants and therefore increased health risks to residents in Alexandria, the District of Columbia, and the entire D.C metro area.

The Sierra Club cannot possibly support a permit proposal that leads to increased PM<sub>2.5</sub> emissions in a city where citizens have already been subjected to decades of pollution and toxic chemicals from the PRGS. Particularly now that we have many cleaner energy alternatives at our disposal and given that the facility is no longer needed for electrical reliability needs in the D.C metro area, proper modeling should be performed and the facility required to reduce output down to a level that is protective of the NAAQs not just in the city of Alexandria but regionally. It is time to move past 18<sup>th</sup> century technologies.

The city of Alexandria has developed considerable expertise in the modeling of local PM<sub>2.5</sub> impacts from the PRGS, due to necessity and for the protection of its own citizens since the state and DEQ continue to refuse to consider the health impacts of fine particles from the PRGS, a known contributor to increased lung and cardiovascular disease. Many of the residents at Marina Towers where the PRGS impacts are the greatest are elderly and particularly vulnerable. We are confident in the city analysis and that the proposed emissions limit pose an unacceptable health risk to Alexandrians.

Furthermore, the facility is a known hot spot for many pollutants. This is clear from looking at the monitor PM<sub>2.5</sub> data from April-June 2007 at Marina towers relative to the regional background in northern Virginia, where many instances can be found where concentrations at Marina Towers exceeded those of other northern Virginia monitors. Given that Virginia DEQ is currently developing the PM<sub>2.5</sub> SIP and implementing the ozone SIP, now is the time to determine the PRGS contribution to local NO<sub>x</sub>, SO<sub>2</sub>, primary PM<sub>2.5</sub> and secondary PM<sub>2.5</sub> formation from precursor pollutants in the D.C non-attainment area, not after the approval of the SIP.

Along the same lines, we also believe that any SOP issued to the PRGS should be consistent with the Virginia Clean Air Interstate Rule (CAIR) NO<sub>x</sub> and SO<sub>2</sub> limits for the PRGS. According to this draft SOP, the NO<sub>x</sub> annual and ozone season emission limits are more than twice the CAIR emission limits. Please see comments submitted by the Southern Environmental Law Center for more details.

EPA has established protocols for Continuous Emission Monitoring (CEM) reporting and states and counties regularly report PM<sub>2.5</sub> concentrations in near-real time. It is not clear why Mirant is only required to report measured PM<sub>2.5</sub> concentrations and emission rates every four to six months. The public should have easy access to CEM stack monitoring (via the internet) in near-real time and at a minimum one month after the end of each month.

The PRGS should be financially responsible for determining that they are not exceeding the NAAQS for any criteria pollutant via CEM at Marina Towers and other locations surrounding the plant.

I want to take this opportunity to thank the Air Board for the considerable time and resources that you have spent to help resolve this very important matter.

Sincerely,

Ana Prados  
Air Quality Chair, Mount Vernon Group  
Sierra Club, Virginia Chapter  
8339 Moline Place  
Springfield, VA 22153  
(703)-338-2119

Mike Town  
Director  
Sierra Club, Virginia Chapter  
422 E. Franklin Street, Suite 302  
Richmond, VA 23219  
(804)-225-9113

Jason E. Broehm  
Chair  
Sierra Club, D.C Chapter  
4000 Albemarle St., NW, Suite 310  
Washington, D.C 20016  
(202)-363-4366